

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

ALFA LIFE INSURANCE CORPORATION	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CV-05-775-MEF
	)	
ADVANTAGE CONSULTING GROUP, INC.	)	
and RICHARD E. KNUTSON,	)	
	)	
Defendants.	)	

**MOTION TO RECONSIDER**

Defendants Advantage Consulting Group, Inc. (“Advantage”) and Richard E. Knutson (“Knutson”) (hereinafter collectively referred to as “Defendants”), through counsel, request the Court to reconsider its Order denying Defendants’ Unopposed Motion to Extend Deadline for the Parties to Amend Pleadings and Add Parties. In support of this motion, Defendants state as follows:

1. On or about March 1, 2006, Defendants filed an Unopposed Motion to Extend Deadline for the Parties to Amend Pleadings and Add to Parties (“Motion to Extend”). Defendants’ Motion to Extend specifically requested the Court to extend the deadline to amend pleadings and add to parties until thirty (30) days after Plaintiff Alfa Life Insurance Corporation (“Alfa”) files a reply to Defendants’ anticipated Answer and Counterclaim.

2. The Court denied Defendants’ Motion to Extend on March 3, 2006.

3. The parties are exchanging documents as part of their initial discovery efforts. Defendants will be able to determine which, if any, additional parties must be joined in this action within the next month. Accordingly, Defendants respectfully request the Court to reconsider its Order denying the Motion to Extend, and to extend the deadline for the parties to

amend the pleadings and add to parties to April 14, 2006, which will be only forty-five (45) days from the Scheduling Order's original deadline date of March 1, 2006.

5. Defendants do not anticipate that this proposed extension will affect any other deadlines in the Court's Scheduling Order.

WHEREFORE, Defendants respectfully request this Court to reconsider its March 3, 2006 Order denying the Unopposed Motion to Extend Deadline for the Parties to Amend Pleadings and Add to Parties, and to allow the parties a forty-five (45) day extension, until April 14, 2006, to amend the pleadings and add to parties.

Dated this the 6th day of March, 2006.

/s/ J. Forrest Hinton \_\_\_\_\_  
J. FORREST HINTON  
ANNE L. WOHLFELD

Attorneys for Defendants Advantage Consulting  
Group, Inc. and Richard E. Knutson

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 7, 2006 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, that all parties are represented by counsel to whom the CM/ECF system will send a Notice of Electronic Filing. Pursuant to Section II(B)(1)(a) of this Court's Administrative Procedures for Filing, Signing and Verifying Pleadings in the District Court Under the Case Management/Electronic Case Files (CM/ECF) System, such notice is the equivalent of service by hand delivery.

Mr. William P. Gray, Jr.  
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/s/ J. Forrest Hinton

OF COUNSEL